

Remarks

Claim 1 has been amended to remove pyridinium cation and alkyl and alkylene anion. Claim 16 has been changed to independent form. Claims 5, 6, 18, 19 and 22 have been canceled. No new matter has been added.

Claim Rejection under Sections 112, first

Claims 18, 19 and 22 are rejected as allegedly lacking written description pursuant to 35 USC 112, first paragraph. This rejection is respectfully traversed.

In the rejection, the Examiner argues that there is no support for the recitation of the variable A⁻ in claims 18 and 19 while leaving the scope of K⁺ as found in Claim 1. To satisfy the written description requirement, all that is needed is for the disclosure to "reasonably convey" that applicants' had possession of the claimed subject matter at the time of filing. See, e.g., *In re Kaslow*, 217 USPQ 1089 (Fed. Cir. 1982). *Ipsis verbis* disclosure is **not required**. See, e.g., *Fujikawa v. Wattanasin*, 39 USPQ 1895 (Fed. Cir. 1996).

As set forth at page 3 of the specification and in the original claims, formula K⁺A⁻, includes the variables for anion A⁻ and cation K⁺. One of ordinary skill in the art would reasonable select the anion set forth in the examples. As a result, the specification more than reasonably conveys to one of ordinary skill in the art that applicants' had possession of the subject matter of claims 18, 19 and 22 at the time of filing.

However, in the interest of furthering prosecution, Applicants have cancelled claims 18, 19 and 22, rendering the rejection moot.

Withdrawal of the rejection is respectfully requested.

Claim Rejection under Sections 112, second

The claims have been rejected under 35 USC 112, second paragraph. It is believed that the amendments, in part, render the rejections moot.

Claim 15 is dependent on claim 1 and thus already includes all the features recited in claim 1, including the definitions of variables groups K⁺ and A⁻. Applicants need not define what is already defined.

Withdrawal of the rejection is respectfully requested.

Claim Rejection under Sections 102 (b)

Claim 22 stands rejected under 35 USC 102(b) as allegedly anticipated by Cismaru, Grachek, Clegg and JP 11-171981. Claims 1, 2 and 19 are rejected under 35 USC 102(b) as allegedly anticipated by Basset. Claims 1 and 18 are rejected under 35 USC 102(b) as allegedly anticipated by Bessler. Claims 1, 2, 11-14 and 19 are rejected under 35 USC 102(b) as allegedly anticipated by JP 11-067604 and Claims 1-3 and 9 are rejected under 35 USC 102(a) as allegedly anticipated by JP 11-209583.

None of the Anions disclosed in the office action are encompassed by Applicant's claims. For example, with regards to the anions of Cismaru, Grachek, Clegg and JP 11-171981, when one or more pairs of R7 to R10 form 1,2-phenylene, the phenylene ring is unsubstituted. In the case of the anion taught in Basset, JP 11-067604 and JP 11-209583, one or more pairs of R7 to R10 form a -Phe-CO- structure, not a substituted phenylene ring.

However, in the interest of furthering prosecution, Applicant's have amended the claims to further distinguish the claims from the prior art. It is believed that all rejections are now moot. Further, the references do not disclose or suggest onium borates according to applicant's invention.

Thus, the rejections under section 102(b) should be withdrawn.

Claim Rejections under Section 103 (a)

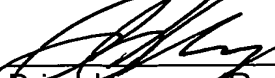
Claims 1,2 and 9 were rejected under 35 USC 103(a) as allegedly unpatentable over either Cismaru or Gracheck et al.

It is believed that the amendment to the claims render the rejection moot. Thus, the rejection under 35 USC 103(a) is respectfully requested.

It is submitted that the claims are in condition for allowance. However, the Examiner is kindly invited to contact the undersigned to discuss any unresolved matters.

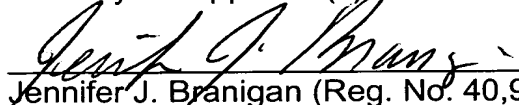
The Commissioner is hereby authorized to charge any fees associated with this response or credit any overpayment to Deposit Account No. 13-3402.

Respectfully submitted,



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